

Annual 47 C.F.R. § 64.2009(e) CPNI Certification

EB Docket 06-36

Annual 64.2009(e) CPNI Certification for 2009

Date filed: February 26, 2010

Name of company covered by this certification: Curatel, LLC

Form 499 Filer ID: 823068

Name of signatory: Mauricio Fux

Title of signatory: Executive Vice President

I, Mauricio Fux, certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. See 47 C.F.R. § 64.2001 et seq.

Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements set forth in section 64.2001 et seq. of the Commission's rules.

The company has not taken any actions against data brokers in the past year. Further, the company has not received any customer complaints in the past year concerning the unauthorized release of CPNI

Signed



Mauricio Fux, EVP

STATEMENT OF CURATEL OPERATING PROCEDURES ENSURING COMPLIANCE WITH 47 C.F.R. 64.2009

1. Associates who have no need to access personal information do not have access to it within our systems.
2. Associates who have access to personal information are required to verify the customer's identity before releasing any personal information or account information, including billing or call records.
3. Associates will verify the customer's identity before processing any changes to an account, including address change.
4. In verifying customer identity, the associate will ask for the following information:
 - a. La Curacao account number
 - b. First and Last Name
 - c. Street address and phone number¹
 - d. 2 of the following 3 items
 - i. Mother's maiden name
 - ii. Date of birth
 - iii. Last 4 digits of Social security number or alternate ID used when opening the account.
5. Associates who deal with customers over the phone are periodically monitored to determine whether they are correctly verifying customers' identities.
6. The company does not share customer personal information with outside marketing firms or collection companies.
7. Call records, names and addresses are shared with other service providers only to the extent that it is required in order to provide the requested service for the customer. Each of these arrangements is governed by a non-disclosure agreement.

The above procedures ensure that Curatel does not reveal CPNI to any but a customer's authorized representative. As noted in #6, above, we do not disclose or provide CPNI to third parties in connection with marketing campaigns or collection activities. Should our policy change in this regard, we will do so only in compliance with 47 C.F.R. 64.2009(c).

¹ The address and phone number are required only if the customer has purchased local phone service.